

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

Civ. Action No.: 14-cv-00029-AB

THIS DOCUMENT RELATES TO:
ALL ACTIONS

STIPULATION AND [PROPOSED] ORDER¹

This Stipulation and Agreement, dated May [18], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Player Andre Reed (ECF No. 6533);

WHEREAS, Andre Reed has since submitted a written request seeking to revoke his Opt Out request (*see Exhibit 1 (Declaration of Orran L. Brown, Sr.)*);

WHEREAS, the Parties have agreed to accept the revocation request submitted by Andre Reed, subject to Court approval, because he submitted the request before Opt Out litigation has commenced in this Court;

AND NOW, this [1st] day of May, 2017, it is hereby stipulated and agreed by the Parties that the revocation request submitted by Andre Reed is accepted, subject to Court approval, because he submitted the request before Opt Out litigation has commenced in this Court.

It is so STIPULATED AND AGREED,

By: 

Date: 5/18/17

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Class Counsel

Counsel for the NFL Parties

It is so **ORDERED**, based on the above Stipulation and the accompanying Declaration of Orran L. Brown, Sr., that the revocation request submitted by Andre Reed is approved and the Claims Administrator is **DIRECTED** to post a revised list of Opt Outs forthwith excluding Andre Reed.

ANITA B. BRODY, J.

Copies **VIA ECF** on _____ to:

Copies **MAILED** on _____ to: